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Attorney for Plaintiff
WILLIAM GRAHAM

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WILLIAM GRAHAM,

Plaintiff,

vs.

AT&T PENSION BENEFIT PLAN -
NONBARGAINED PROGRAM; AT&T,
INC.; and DOES 1-10,

Defendants.

CASE NO. 11-CV-4085 TEH

**STIPULATION FOR DISMISSAL OF
ENTIRE ACTION WITH PREJUDICE
AND ~~PROPOSED~~ ORDER**

Complaint Filed: August 15, 2011

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7 AT&T PENSION BENEFIT PLAN - NONBARGAINED PROGRAM and AT&T, INC.
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1 Plaintiff William Graham ("Plaintiff"), Defendant AT&T Pension Benefit Plan – Nonbargained
2 Program ("Plan") and Defendant AT&T, Inc. ("AT&T") hereby stipulate, by and through their
3 counsel of record, as follows:

- 4 1. Plaintiff has identified both the Plan and AT&T as defendants in this lawsuit filed under the
5 Employee Retirement Income Security Act of 1974, as amended ("ERISA"). Plaintiff has
6 served Defendants AT&T and the Plan with the Complaint, and Defendants AT&T and the
7 Plan filed Answers disputing Plaintiff's entitlement to benefits under the Plan.
- 8 2. The parties have reached a settlement and have agreed Plaintiff will dismiss his entire action
9 voluntarily, with prejudice, pursuant to Federal Rule of Civil Procedure 41(a)(1).
- 10 3. The parties respectfully request, in the Proposed Order filed herewith, that the Court enter an
11 Order dismissing with prejudice Plaintiff's entire action in the above-captioned matter.
- 12 4. Each party shall bear its own costs, attorneys' fees and expenses.

13 IT IS SO STIPULATED by and between the parties.

14 Dated: April 23, 2012

PATRICK W. SHEA
STEPHEN H. HARRIS
M'ALYSSA C. MECENAS
PAUL HASTINGS LLP

15 By: /s/ Patrick W. Shea
16 PATRICK W. SHEA

17
18 Attorneys for Defendants
19 AT&T PENSION BENEFIT PLAN – NONBARGAINED
PROGRAM and AT&T, INC.

20 Dated: May 1, 2012

ROGER P. ROZEK

21 By: /s/ Roger P. Rozek
22 ROGER P. ROZEK

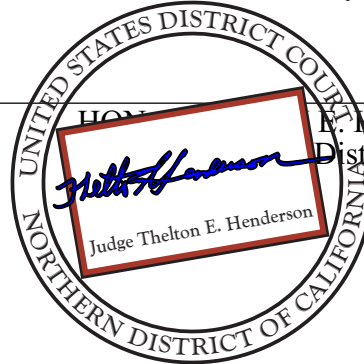
23 Attorney for Plaintiff
24 WILLIAM GRAHAM

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS ORDERED that Plaintiff's entire action be dismissed with prejudice. Each party shall bear its own costs, attorneys' fees and expenses.

DATED: 05/23, 2012

By: _____



HON. J. E. HENDERSON
District Court